

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

ALL CASES

MDL No. 3047

Case No. 4:22-md-03047-YGR

**KENTUCKY ATTORNEY GENERAL'S
MOTION TO ENLARGE TIME FOR
STATE AGENCY SUBSTANTIAL
COMPLETION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Under Civil Local Rules 6-1 and 6-3, the Kentucky Attorney General submits this Motion to Enlarge Time for State Agency Substantial Completion.

As discussed in the attached declaration, the Kentucky Commonwealth Office of Technology, Governor's Office, Office of the State Budget Director, Cabinet for Health and Family Services, Department for Public Health and Department for Behavioral Health, Developmental and Intellectual Disabilities have all been working diligently to meet today's substantial completion deadline. However, due to the volume of documents and small teams working on review and production, they are unable to meet today's deadline. As a result, the Kentucky Attorney General is requesting an extension of time to February 28, 2025 for substantial completion of production of state agency documents requested pursuant to Rule 34.

KENTUCKY ATTORNEY GENERAL'S MOTION TO ENLARGE TIME FOR STATE
AGENCY SUBSTANTIAL COMPLETION

1 Under Federal Rule of Civil Procedure 6, “[w]hen an act may or must be done within a
2 specified time, the court may, for good cause, extend the time ... with or without motion or notice
3 if the court acts, or if a request is made, before the original time or its extension expires.” Fed. R.
4 Civ. P. 6(b)(1)(A). “Where good cause is shown, a request for an extension generally should be
5 granted in the absence of bad faith by the moving party or prejudice to the adverse party.” *Khokhar*
6 *v. Gov’t of Pakistan through its Ministries*, 2017 WL 4552059, at *1 (N.D. Cal. Oct. 10, 2017)
7 (citing *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1258-59 (9th Cir. 2010)). Further, as the
8 Ninth Circuit has recognized, “[g]ood cause’ is a non-rigorous standard.” *Ahanchian*, 624 F.3d at
9 1259.

10 Here, there is good cause for the extension. As noted in the declaration, the relevant
11 Kentucky State Agencies have been working towards the January 31, 2025 substantial completion
12 deadline and are continuing to do so. Meta will not be prejudiced by this enlargement of time, as
13 Kentucky does not object to giving Meta a reciprocal enlargement of time to take its 30(b)(6)
14 deposition. Thus, providing Kentucky with an enlargement of time with the understanding that
15 Meta would also receive additional time (up to April 4, 2025) to complete Kentucky’s 30(b)(6)
16 deposition would allow Kentucky to meet substantial compliance without prejudicing Meta, and
17 without the need to change the Court’s April 4, 2025 deadline. As such, the Kentucky Attorney
18 General respectfully requests an enlargement of time to February 28, 2025 for substantial
19 completion of State Agency productions.
20

1 DATED: January 31, 2025

Respectfully submitted,

2
3 **RUSSELL COLEMAN**

4 Attorney General Commonwealth
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5 /s/ Matthew Cocanougher

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